

USDA PRIVACY IMPACT ASSESSMENT FORM

Project Name: Store Tracking and Redemption System II (STARS II)

Description of Your Program/Project: STARS II, a distributed web-based system, is replacing the existing STARS I, a mainframe system. STARS II supports the retailer management function of the Food Stamps Program. It tracks data related to participating retailers, store owners or corporate officers, investigations and cases against suspected program violators, and related data on the stores participation in the program.

DATA IN THE SYSTEM

<p>1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other.</p>	<p>Customer</p> <ul style="list-style-type: none">- Information on Stores includes general store information such as address, ownership details, redemption history, EIN data.- Information on Persons includes general information such as address, relationship to stores or corporations in the program, SSN data, and program violations if any. <p>Employee</p> <ul style="list-style-type: none">- Information on employees is limited to their name, user id, office, and related security privileges for access to various system functions.
<p>2a. What are the sources of the information in the system?</p>	<p>Sources of information come from three categories:</p> <ol style="list-style-type: none">1. Data input by the FNS user that he/she derives from submitted forms and information gathered by the user or the users agents.2. Data input by a participating store that has appropriate agreements with FNS. This data is always reviewed and approved by FNS.3. Data received from other systems or processors of data. STARS II receives redemption data from the Federal Reserve Banks and Electronic Benefits Transfer processors. STARS II receives compliance analysis data from ALERT and VPP. STARS receives payment of fines data from the agency accounting system, IPAS. Social Security Number verification will be coordinated with the SSA.

2b. What USDA files and databases are used? What is the source agency?	None.
2c. What Federal Agencies are providing data for use in the system?	Treasury and Social Security Administration
2d. What State and Local Agencies are providing data for use in the system?	State Law Enforcement Bureaus provide investigation related summary information.
2e. From what other third party sources will data be collected?	States provide electronic benefit redemption data via their contracted agents; some of this data comes from third-party providers.
2f. What information will be collected from the customer/employee?	Data related to the participation in the FSP such as mailing and location address and business information.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	Computer Matching
3b. How will data be checked for completeness?	FNS field office staff will validate information.

ACCESS TO THE DATA

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	The primary users of the system are FNS employees. These users are generally segregated into those with the ability to update the data and those that have read only access. In addition, State users have read only access to the system. Some participating retailers will have limited access to submit data via a portal. System administrators and developers will have limited access to the data in the system.
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	Access to the system will follow FNS existing processes using the form 674.
3. Will users have access to all data on	Access to the system will be granted to classes of users and to users individually.

the system or will the user's access be restricted? Explain.	
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	An audit trail of user request for searches and reports of certain data is recorded. An audit trail of changes to system data is captured for later review.
5a. Do other systems share data or have access to data in this system? If yes, explain.	Data from STARS II will be downloaded and shared with other systems within FNS.
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	FNS security officers.
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	State Law Enforcement Bureaus, WIC State Agencies, and OIG have access to read data in this system.
6b. How will the data be used by the agency?	The data will be used in support of the agencies investigations into fraudulent or other illegal activity.
6c. Who is responsible for assuring proper use of the data?	FNS' staff under established security procedures.

ATTRIBUTES OF THE DATA

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Yes.
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	Yes.
2b. Will the new data be placed in the individual's record (customer or employee)?	Yes.
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	Yes.
2d. How will the new data be verified for relevance and accuracy?	Through site visits, investigations, administrative review, court challenges, etc.
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	<ul style="list-style-type: none"> - Physical access to the servers is protected by the BRSB policy and procedures. - Electronic access to the servers is protected by FNS/USDA firewalls and network security. - The application is protected by authorization and authentication at the application level. - Intrusion detection devices will monitor the servers that are available to the public. - EIN and SSN data is stored encrypted in the database.
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	Processes are being consolidated and the controls will remain in place via the applications implementation of security privileges at the role and individual level.
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	The data will be retrieved by searches and reports based on various search including personal identifiers for owners of retail firms and meal service sponsors, and also by FNS employee for their workload management and supervision.

4b. What are the potential effects on the due process rights of customers and employees of: <ul style="list-style-type: none"> • consolidation and linkage of files and systems; • derivation of data • accelerated information processing and decision making; • use of new technologies. 	There is no change in FNS' Food Stamp Program law, regulations or procedures protecting customers and employees due process rights under the new system.
4c. How are the effects to be mitigated?	Established procedures will continue and be maintained.

MAINTENANCE OF ADMINISTRATIVE CONTROLS

1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	The system will be used to monitor the participation of retailers in the FSP according to the policies and relevant laws that govern their participation.
2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	Not applicable.
2b. Explain any possibility of disparate treatment of individuals or groups.	None.
2c. What are the retention periods of data in this system?	Database: Temporary. Retain online and archive off-line until obsolete or superseded, whichever is later. Output Reports: Temporary. Retain until obsolete or superseded.
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Archive off-line until obsolete or superseded. Tapes and/or disks/diskettes must be erased when authorized for destruction. Procedures are documented in the FNS Instruction 270-1.
2e. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	FNS is required to re-authorize stores periodically. FNS monitors participating retailers through its Regional and Field Offices and through the Retailer Investigation Branch.
3a. Is the system using technologies in	No.

ways that the USDA has not previously employed (e.g. Caller-ID)?	
3b. How does the use of this technology affect customer/employee privacy?	An established Privacy Act system of records has been in place that is governed by the Privacy Act.
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	No.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	No.
4c. What controls will be used to prevent unauthorized monitoring?	Not applicable
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	Notice of New Privacy Act System of Records – Food Stamp Program Retailer Information published December 2, 1996. Federal Register Vol. 61 No. 232. (USDA-FNS-9)
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	No, because we're just converting the existing mainframe system into a web-based application. We're still collecting the same information to be inputted.